Introduction to Facilitated Registration Pathways and Collaborative Registration Procedure (CRP)

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Facilitated Regulatory Pathways (FRP)….solution to NRAs?

When timely access to quality-assured products is compromised…

NRAs carry great responsibilities in ensuring <u>timely access to quality assured products to their population</u>

Internal factors: low maturity of many regulatory systems, lack of resources and expertise in-house, and ack of collaboration between countries

External factors: increasing complexity of supply chains and global challenges, such as health emergencies

- Overwhelm NRAs - lengthy regulatory approvals of much needed medical products
- Patients' timely access to much-needed quality-assured medicines is compromised

FRPs, as a solution for NRAs and public health

FRP are a type of regulatory pathways available to NRAs, which are meant to facilitate and accelerate the regulatory decisions and the introduction of quality-assured products in countries, through the use of the concepts of reliance and collaboration. When well implemented:

What are Facilitated Regulatory Pathways (FRPs)?

- NRAs leverage on the work performed by others, improving efficiency of the regulatory systems by avoiding duplication of regulatory efforts and work.
- NRAs optimize the use of human and financial resources and increase expertise and build capacities
- NRAs reduce the time nedeed to process a product application and reduce workload and backlog at NRAs
- NRAs perform science-based and transparent regulatory decision-making, while maintaining national independence on their decisions
- NRAs ensure timely access to priority quality-assured products in countries.

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What are the FRPs available?

What is their relation with CRP?

WHA resolution 67.20, in 2014, recognized a model of Regulatory pathways available to NRAs to approve a product

Selection of FRP for a product based on the risk-based approach of each NRA

Level of effort, work, resources, expertise, time and duplication

Facilitated Regulatory Pathways

New Assessment

Full/Accelerated assessment

Assessment of full product dossier conducted by the NRA

New Assessment

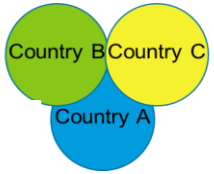
Joint Assessment

E.g. Assessment conducted jointly by 2 or more NRAs (full review or with reliance) - EU centralised procedure, **ASEAN** JA or EAC JA

New Assessment

Work-sharing

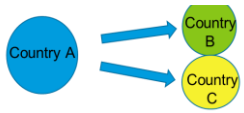
E.g. when it is agreed between 2 or more NRAs that only 1 NRA assesses (full review or with reliance) and the remaining ones grant MA based on that assessment. - EU decentralized procedure, ZAZIBONA



Existing Assessment

Reliance

E.g. Secondary and abridged reviews of existing primary reports generated from "SRA" or WHO PQ – CRP and EU mutual recognition



Existing Assessment

Recognition

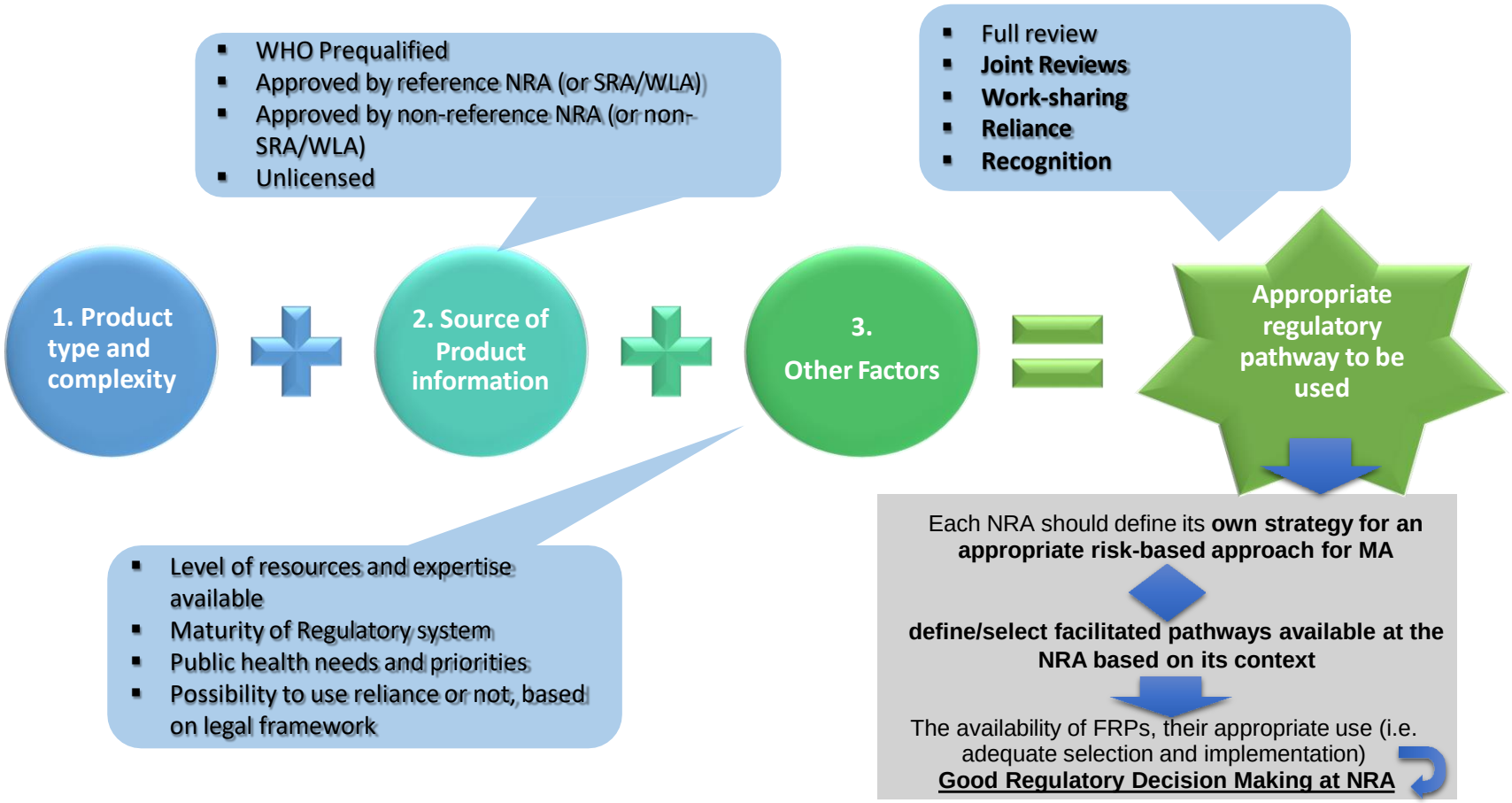
E.g. Product approval based on "SRA" or WHO PQ. Verification of the sameness without further review or assessment of product information. - CRP

Mutual recognition

Unilateral

Regulatory Risk-based approach to implement pathways:

Key considerations for Good Regulatory decision-making processes for quality-assured products



But how can NRAs apply FRPs in a confident manner?

WHO supports countries and coordinates mechanisms that facilitate regulatory decisions and products introduction by countries

WHO FPI Webpage: https://www.who.int/teams/regulation-prequalification/regulation-and-safety/facilitated-product-introduction

Aligned with WHO GRP and WHO GRelP

1. Support to countries for the implementation of FRPs, as part of implementation of CRP and other Reliance approaches
   - Individual countries, through CRP and RJA
   - Regional systems, through CRP and RJA

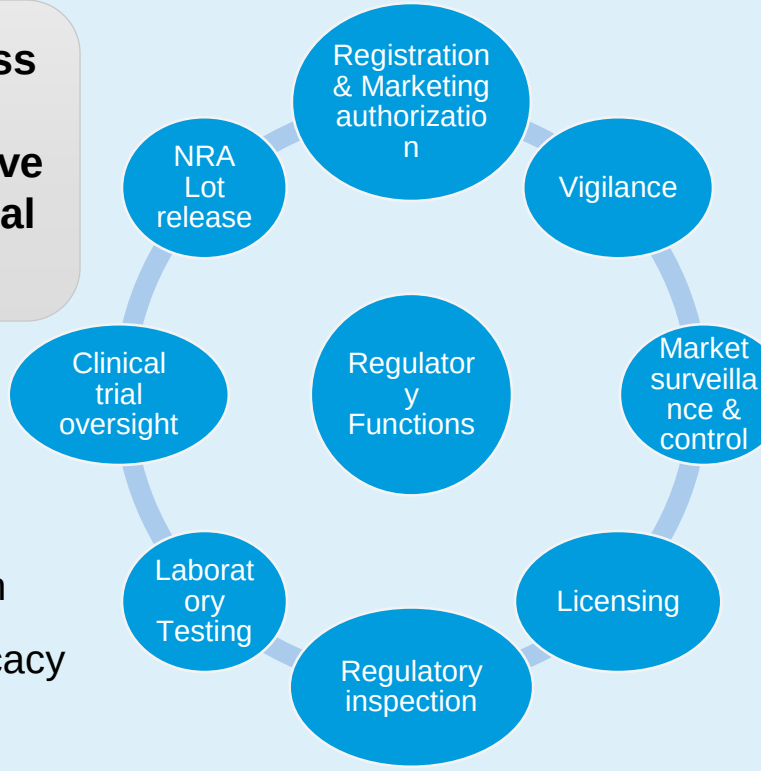
2. WHO Mechanisms for collaboration/reliance between countries:
   - Collaborative Registration Procedure (CRP)
     1. WHO Prequalified products
     2. SRA assessed and/or approved products
     3. Pilot on CRP-lite with FDA on HIV products
   - Programmes aimed to facilitate and accelerate product registration and introduction in countries for specific public health needs and emergencies, e.g. COVAX (COVID-19 vaccines)

3. WHO supported activities for collaboration and Work-
   - Technical support to Regional Joint Assessments and work-sharing arrangements among cooperating countries (ASEAN JA, African Regional JAs, CRS)
   - EU-M4All Procedure & Swissmedic MAGHP program, which aim to facilitate product introduction in countries based on reliance, following EMA opinion or Swissmedic approval
   - Reliance projects or programmes, such as Reliance for Post-Approval changes

Reliance concept

Leveraging output of other regulators to make best use of resources and expertise - Smarter, efficient regulation

Improved access to quality-assured, effective and safe medical products



- Apply a risk-based approach
  - Avoid duplication of effort
- During implementation, consider
  - Development of lean/efficient processes, harmonization
  - Requirements with implications on safety, quality or efficacy vs “nice to know/have”
- Reliance, once adopted, should be applied throughout life cycle of medical products and in all regulatory functions

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Collaborative Registration Procedure (CRP)

WHAT it is and HOW does it work?

CRP facilitates exchange of information to accelerate national registrations in countries through the provision to NRAs of detailed assessment and inspection reports generated by reference NRAs/PQ

Applicant

Single product dossier

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Prod. Assessment Reports from SRA/PQ

To multiple CRP participating country(s)

Accelerated assessment and registration of quality-assured products in countries

Faster access to priority quality-assured products by the population

IVD products currently eligible for submission for prequalification

HIV

HIV-1/HIV-2

HIV-1/HIV-2

Hepatitis C virus (HCV)

HCV

Hepatitis B surface antigen (HBsAg)

Hepatitis B virus

Malaria parasites

Human papilloma virus

G6PD enzyme

Toxigenic Vibrio cholerae

Treponema pallidum (syphilis)

Mycobacterium tuberculosis complex and resistance to first and/or second line anti-TB drugs

SARS-CoV-2

Blood glucose

HbA1c

CRP Process

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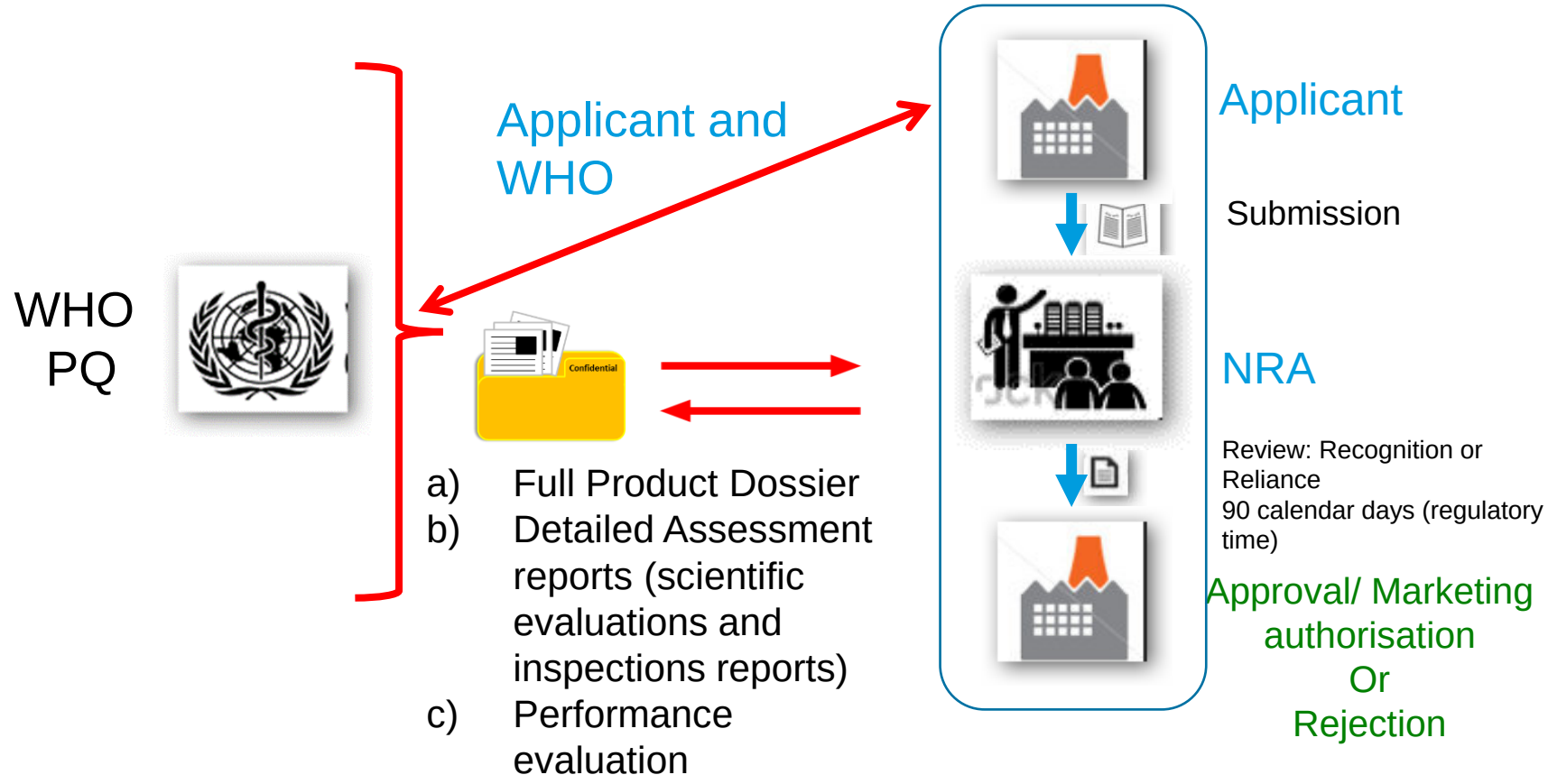
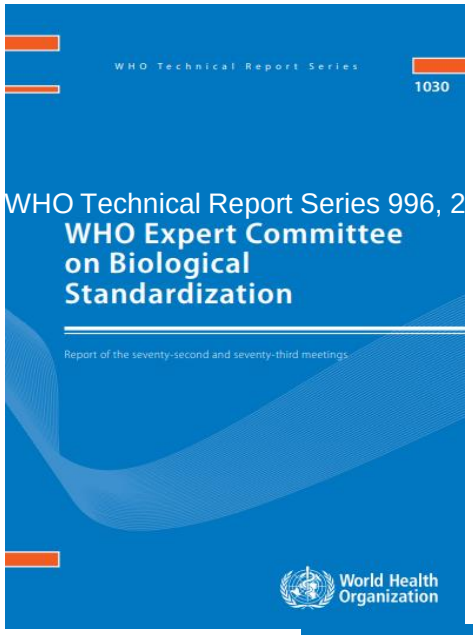
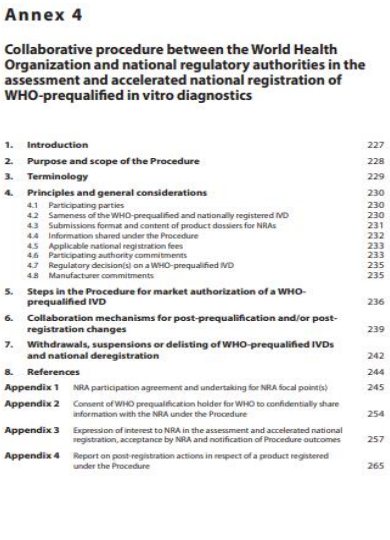
1. Source of Information to rely upon:

2. Documentation to be shared:

3. Actions for different stakeholders







Annex 4

Collaborative procedure between the World Health Organization and national regulatory authorities in the assessment and accelerated national registration of WHO-prequalified in vitro diagnostics

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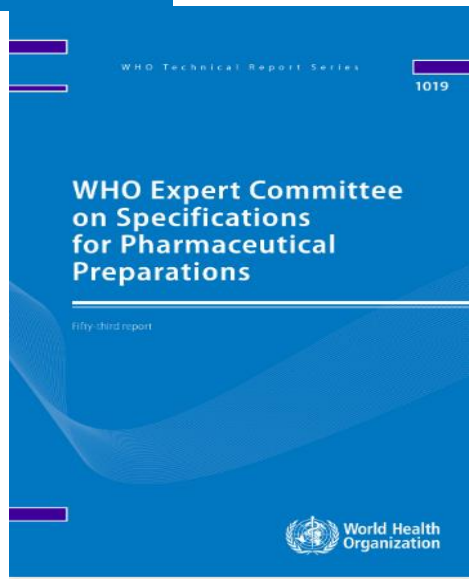
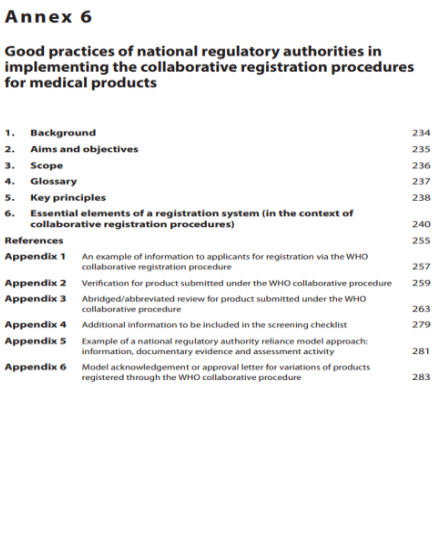
https://www.who.int/publications/i/item/9789240024373

Published guidelines





Annex 6

Good practices of national regulatory authorities in implementing the collaborative registration procedures for medical products

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TRS 1019 - 53rd report of the WHO Expert Committee on Specifications for Pharmaceutical Preparations - ***Annex 6***

CRP- IVDs: 36 participating NRAs

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As of August 2024

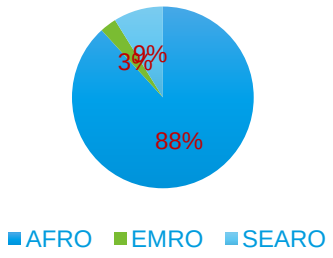
Angola
Bangladesh
Benin
Bhutan
Botswana
Burkina Faso
Burundi
Comoros
Congo Republic
Cabo Verde
Cote d`Ivoire
DRC Congo
Eritrea
Ethiopia
Gabon
Ghana
Kenya
Uganda
Malawi
Mauritania
Mozambique
Namibia
Nigeria
Rwanda
Senegal
South Africa
Tanzania
Tchad
Thailand
Togo
Zanzibar
Zambia
Uganda
Yemen
Zambia
Zimbabwe

CRP IVD update and progress by August 2024

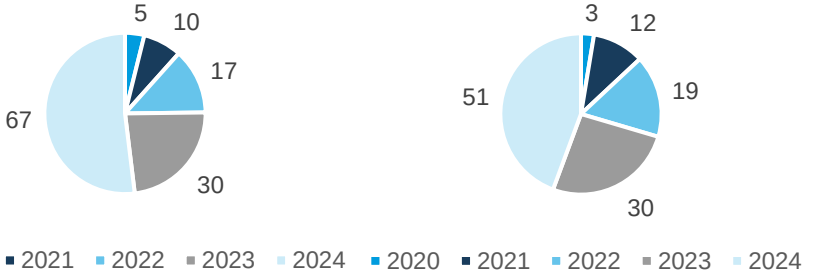
- CRP IVDs, officially launched in 2020
- 3 registration in 2020 to 51 registration in 2024
- 5 submission in 2020 to 67 submission in 2024
- Median registration time: 52 working days
- Participating countries: 36

As of August 2024

IVDs CRP Agreements



IVD products submission via CRP



IVD Product registration via CRP

All the submissions and registrations are from the AFRO region

Implementation of CRP and other FRP in countries

To apply CRP at the NRA → **Implementation of FRPs is needed, namely reliance and recognition approaches**

5 fundamental questions NRAs need to answer to properly implement FRPs, incl. CRP:

1. Do the **national regulations of your country allow your NRA to apply reliance approaches towards MA activities**? On the contrary, do they impede the use of reliance in your NRA for MA? If yes, is there an opportunity for your NRA to incorporate reliance provisions as part of upcoming revisions of the NRA legal framework?

2. Are there **guidelines, policies or regulations at the NRA that define the reference authorities or institutions** in which your NRA can rely upon?

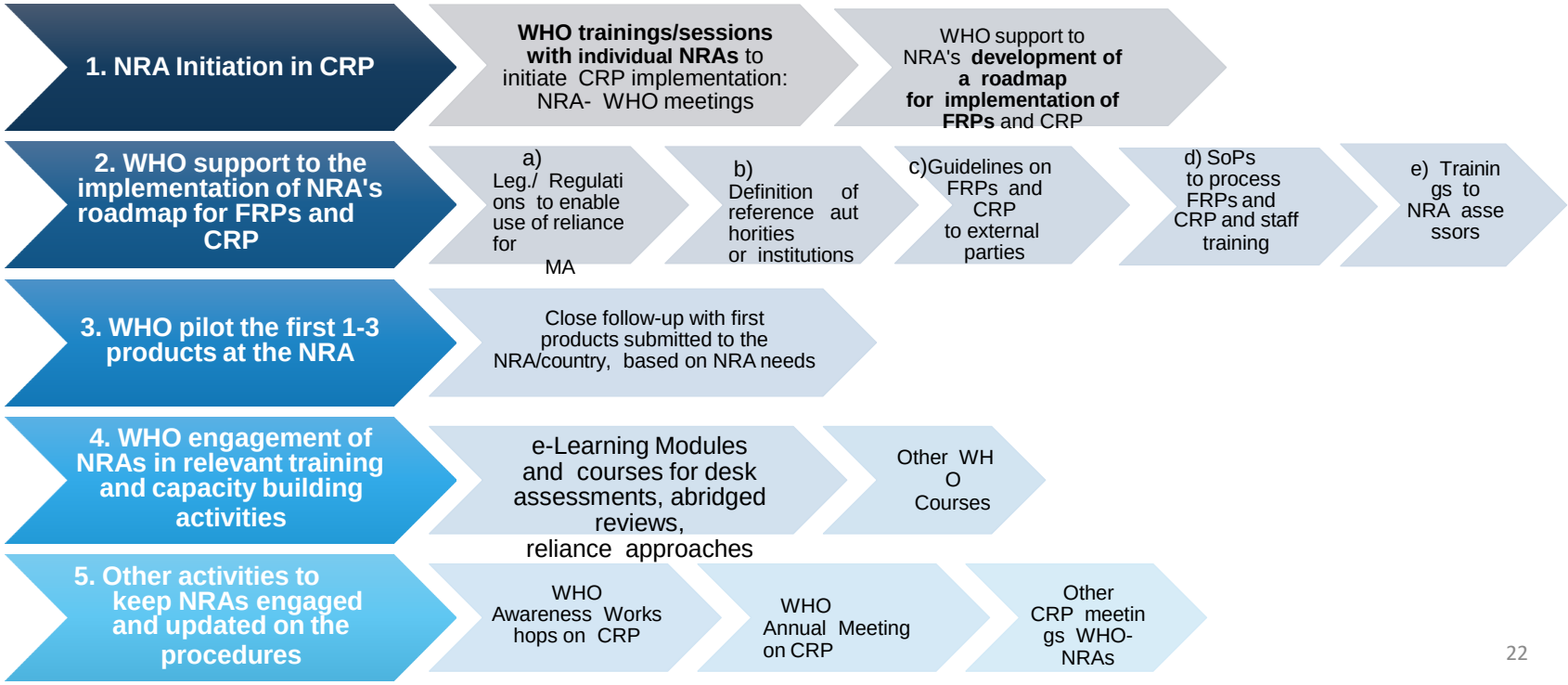
3. Are there **Guidelines to guide stakeholders on the existing facilitated pathways at the NRA,** respective Admin and technical requirements (for initial appoval and PAC)?

4. Are there **internal procedures/SOPs to guide the NRA staff on the process of facilitated pathways applications**, respective procedures to be followed and requirements to be met (for initial appoval and PAC)?

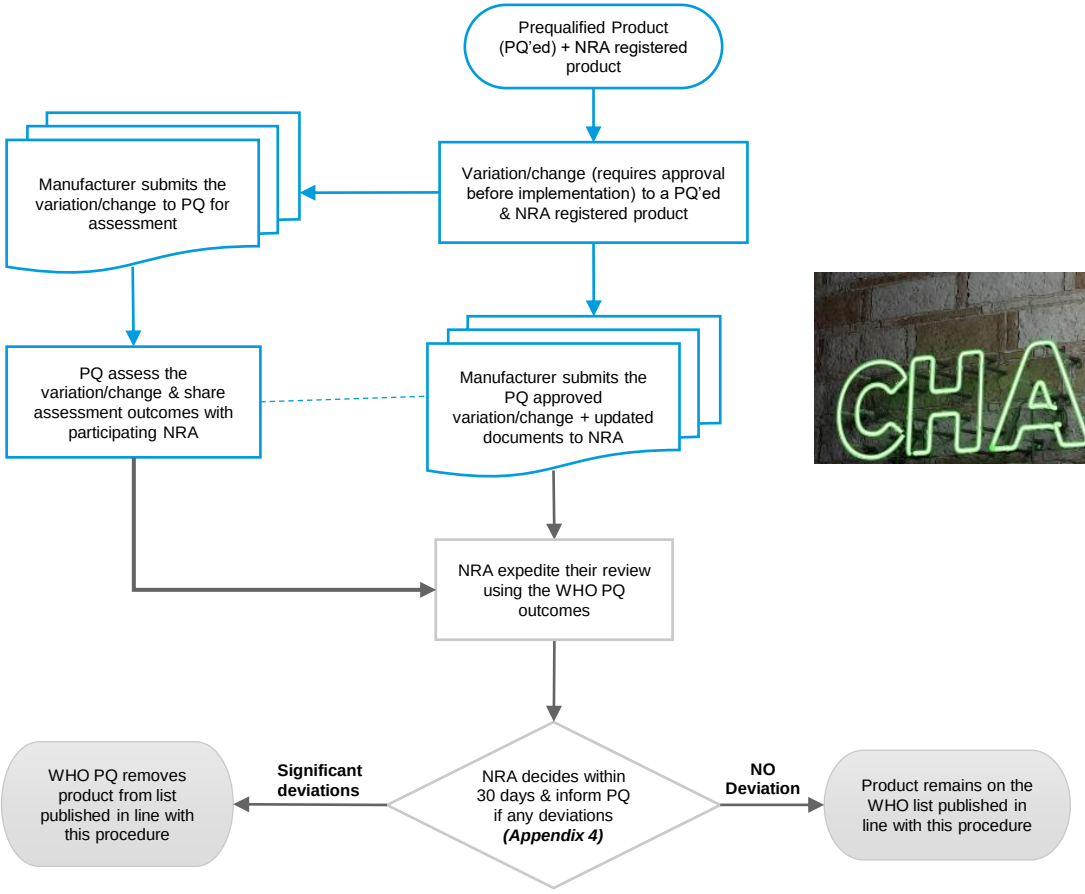
5. Did the **relevant NRA staff received adequate training on the procedures above to process FRPs**, including technical trainings?

Implementation of CRP and other FRP in countries – WHO Support to countries

5-step approach: After a country signs the CRP participation agreement…



Stage 5: Registration Maintenance, Post-Approval changes/ Monthly updates



*Take home message

https://www.tandfonline.com/doi/full/10.1080/17512433.2022.2037419?journalC ode=ierj20

- It is overwhelming for NRAs at all maturity levels to fulfil all regulatory work alone and independently from other regulators;
- **There are several tools nowadays available to NRAs and Industry to facilitate the regulatory decisions**, ensuring timely access to quality-assured products in countries and good regulatory - decision making. **FRPs and mechanisms such as CRP and Joint assessments, are some of those tools available, using the concept of collaboration, reliance and work-sharing between NRAs, which is the future of medical products regulation.**
- Applying those concepts, **NRAs and industry are able to make the best with their available resources and time**, reducing duplication of efforts and workload.


A BIRD WILL ALWAYS USE ANOTHER BIRD'S FEATHERS TO FEATHER ITS OWN NEST.
Afghan Proverb

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Questions and Answers